

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 3252

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION
SECRETARIAT

2017 MAR 20 AM 9:59

March 20, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *PP*
Staff Director

FROM: Patricia C. Orrock *AC for PCO*
Chief Compliance Officer

Debbie Chacona *AC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *BH*
Reports Analysis Division *ll for KR*
Compliance Branch

SUBJECT: Reason To Believe Recommendation – 2016 12 Day Pre-General Report
(Unauthorized Committees – Quarterly Filers) for the Administrative Fine
Program

Attached is a list of political committees and their treasurers who failed to file or timely file the 2016 12 Day Pre-General Report in accordance with 52 U.S.C. § 30104(a). The list is comprised of unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2016 through October 19, 2016, and failed to file or timely file the 2016 12 Day Pre-General Report.

The committees listed on the attached RTB Circulation Report either failed to file the report or failed to file the report prior to four (4) days before the General Election (considered a non-filed report). In accordance with the schedule of civil money penalties at 11 CFR 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

As noted above, the 2016 12 Day Pre-General Report circulation list includes unauthorized quarterly filers that made General Election contributions or expenditures from October 1, 2016 through October 19, 2016, but failed to file or timely file the 2016 12 Day Pre-General Election Report. In order to accurately identify these committees for administrative fine purposes, the Reports Analysis Division (RAD) used the following procedures and criteria:

- 1-2002-14-104
- Every 12 Day Pre-General Report (12G) submitted by an unauthorized quarterly filer was reviewed to ensure that it disclosed General Election contributions or expenditures made during the coverage dates of the report. Any report meeting this definition that was filed late is included in the list. Any report not disclosing general election contributions or expenditures during this period is not included in the list, as it is not a required filing.
 - Every 30 Day Post-General Report (30G) submitted by an unauthorized quarterly filer that covered the period from October 1, 2016 through November 28, 2016 (59 days) was reviewed for activity which would have required the filing of a 12G. If our research indicated that a 12G was required, we utilized a three-step method to arrive at the activity on which to base the 12G fine amount. First, we took the sum of all itemized receipts and disbursements that should have been disclosed on a 12G. Second, if the committee had any unitemized activity, a per diem level of this activity was calculated by multiplying the total amount of unitemized activity on the report by 32.2% (19 days (12G Filing Period)/59 days (30G Filing Period)). Third, we took the sum of the amounts calculated in steps one and two to arrive at the level of activity assigned to the 12G.

Recommendation

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission
Reason to Believe Circulation Report
2016 PRE-GENERAL Election Sensitive 10/27/2016 UNAUTH_Q

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3235	C00623256	AMERICA COMES FIRST PAC		DAVID W. SCHAMENS	\$457,720	0	12/5/2016	Not Filed	\$10,711	\$1,176
3236	C00492579	AMERICAN PRINCIPLES BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)		EYTAN LAOR	\$303,458	0	12/8/2016	Not Filed	\$2,796	\$654
3237	C00559146	CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT COMMUNICATION		JERED TAYLOR	\$197,500	0	1/26/2017	Not Filed	\$21,190	\$1,176
3238	C00078287	WORKERS OF AMERICA LOCAL 13000 CONNELL FOLEY PAC A		KAREN E. MELCHERT	\$428,835	0	11/28/2016	Not Filed	\$28,698	\$1,829
3239	C00109595	NEW JERSEY NON-PROFIT CORPORATION		MARISA MACCRORY	\$437,396	0	12/8/2016	Not Filed	\$15,242	\$1,176
3240	C00388181	GCI PAC		JOHN P. LACEY	\$120,691	0	1/31/2017	Not Filed	\$1,000	\$654
3241	C00387894	GOVERNMENT IS NOT GOD		CHRIS NIERMAN	\$114,199	0	12/20/2016	Not Filed	\$1,007	\$654
3242	C00297531	INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC)		NANCY MURRAY	\$118,518	0	12/16/2016	Not Filed	\$8,218	\$784
3243	C00332031	INVESTCO PLC PAC		JASON TODD	\$173,679	0	12/8/2016	Not Filed	\$5,202	\$784
3244	C00253369	LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE		DOUG KIDD	\$198,182	0	12/8/2016	Not Filed	\$5,000	\$784
3245	C00144170	MIDDLE CLASS AMERICA PAC		HANS STERNBERG	\$161,878	0	12/6/2016	Not Filed	\$4,000	\$654
3246	C00486860	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		MIRIAM TAI	\$116,535	0	11/25/2016	Not Filed	\$12,000	\$1,176
3247	C00528026	PATRIOTS LEADING A MAJORITY		MICHAEL J. CORREIA	\$167,316	0	2/16/2017	Not Filed	\$1,000	\$654
3248	C00526046			LOUIS SCHIAZZA	\$261,512	0	12/7/2016	Not Filed	\$49,000	\$1,829

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AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
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3250	C00436410	ROCK CITY PAC		KIMBERLY KAEGI	\$1,265,601	0	11/28/2016	Not Filed	\$42,503	\$1,829
3251	C00586180	RUSS VICTORY FUND		JOHN W. MILLER	\$2,606,125	0	1/3/2017	Not Filed	\$540,606	\$15,282
3252	C00570226	SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC		VINCENT DEVITO	\$5,239,399	0	12/8/2016	Not Filed	\$314,463	\$12,503

BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)	
)	
Reason To Believe Recommendation - 2016)	
12 Day Pre-General Report (Unauthorized)	
Committees – Quarterly Filers) for the)	
Administrative Fine Program:)	
AMERICA COMES FIRST PAC, and)	AF# 3235
SCHAMENS, DAVID W MR. as treasurer;)	
AMERICAN PRINCIPLES, and LAOR,)	AF# 3236
EYTAN as treasurer;)	
BELIEVE IN LIFE LIBERTY YOURSELF)	AF# 3237
(BILLY PAC), and TAYLOR, JERED as)	
treasurer;)	
CNA FINANCIAL CORPORATION)	AF# 3238
CITIZENS FOR GOOD GOVERNMENT,)	
and MELCHERT, KAREN E. as treasurer;)	
COMMUNICATION WORKERS OF)	AF# 3239
AMERICA LOCAL 13000, and)	
MACCRORY, MARISA as treasurer;)	
CONNELL FOLEY PAC A NEW JERSEY)	AF# 3240
NON-PROFIT CORPORATION, and)	
JOHN P LACEY as treasurer;)	
GCI PAC, and NIERMAN, CHRIS as)	AF# 3241
treasurer;)	
GOVERNMENT IS NOT GOD, and)	AF# 3242
MURRAY, NANCY as treasurer;)	
INDEPENDENT ELECTRICAL)	AF# 3243
CONTRACTORS INC PAC (IEC PRIDE)	
PAC), and TODD, JASON as treasurer;)	
INVESCO PLC PAC, and KIDD, DOUG as)	AF# 3244
treasurer;)	
LOUISIANIANS FOR AMERICAN)	AF# 3245
SECURITY POLITICAL ACTION)	
COMMITTEE, and STERNBERG, HANS)	
as treasurer;)	
MIDDLE CLASS AMERICA PAC, and)	AF# 3246
MIRIAM TAI as treasurer;)	

NATIONAL CANNABIS INDUSTRY AF# 3247
ASSOCIATION PAC, and MICHAEL J.
CORREIA as treasurer;
PATRIOTS LEADING A MAJORITY, and) AF# 3248
SCHLAZZA, LOUIS as treasurer;)

ROCK CITY PAC, and KAEGI,) AF# 3250
KIMBERLY as treasurer;)
RUSS VICTORY FUND, and MILLER,) AF# 3251
JOHN W. as treasurer;)
SEAL PAC SUPPORTING ELECTING) AF# 3252
AMERICAN LEADERS PAC, and)
DEVITO, VINCENT ESQ. as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission,
do hereby certify that on March 22, 2017 the Commission took the following actions
on the Reason To Believe Recommendation - 2016 12 Day Pre-General Report
(Unauthorized Committees – Quarterly Filers) for the Administrative Fine Program as
recommended in the Reports Analysis Division's Memorandum dated March 20, 2017,
on the following committees:

AF#3235 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICA
COMES FIRST PAC, and SCHAMENS, DAVID W MR. as treasurer violated 52 U.S.C.
30104(a) and make a preliminary determination that the civil money penalty would be the
amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman,
Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3236 Decided by a vote of 5-0 to: (1) find reason to believe that AMERICAN
PRINCIPLES, and LAOR, EYTAN as treasurer violated 52 U.S.C. 30104(a) and make a
preliminary determination that the civil money penalty would be the amount indicated on

the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3237 Decided by a vote of 5-0 to: (1) find reason to believe that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3238 Decided by a vote of 5-0 to: (1) find reason to believe that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and MELCHERT, KAREN E. as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3239 Decided by a vote of 5-0 to: (1) find reason to believe that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3240 Decided by a vote of 5-0 to: (1) find reason to believe that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3241 Decided by a vote of 5-0 to: (1) find reason to believe that GCI PAC, and NIERMAN, CHRIS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3242 Decided by a vote of 5-0 to: (1) find reason to believe that GOVERNMENT IS NOT GOD, and MURRAY, NANCY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3243 Decided by a vote of 5-0 to: (1) find reason to believe that INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC), and

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TODD, JASON as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, ~~Hunter~~, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3244 Decided by a vote of 5-0 to: (1) find reason to believe that INVESCO PLC PAC, and KIDD, DOUG as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3245 Decided by a vote of 5-0 to: (1) find reason to believe that LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE, and STERNBERG, HANS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3246 Decided by a vote of 5-0 to: (1) find reason to believe that MIDDLE CLASS AMERICA PAC, and MIRIAM TAI as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3247 Decided by a vote of 5-0 to: (1) find reason to believe that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3248 Decided by a vote of 5-0 to: (1) find reason to believe that PATRIOTS LEADING A MAJORITY, and SCHIAZZA, LOUIS as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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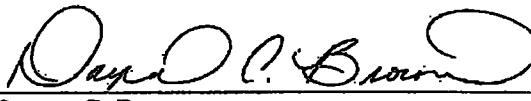
AF#3250 Decided by a vote of 5-0 to: (1) find reason to believe that ROCK CITY PAC, and KAEGI, KIMBERLY as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3251 Decided by a vote of 5-0 to: (1) find reason to believe that RUSS VICTORY FUND, and MILLER, JOHN W. as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3252 Decided by a vote of 5-0 to: (1) find reason to believe that SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC, and DEVITO, VINCENT ESQ. as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

March 22, 2017
Date


Dayna C. Brown
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 2017

Vincent Devito, in official capacity as Treasurer
SEAL PAC Supporting Electing American Leaders PAC
One International Place - 44th Fl., C/O Bowditch & Dewey, LLP
Boston, MA 02110

C00570226
AF#: 3252

Dear Mr. Devito:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a 12 Day Pre-General Report of Receipts and Disbursements in a calendar year during which there is a regularly scheduled election. This report is required if your committee makes a contribution to or expenditure on behalf of a candidate in the general election. This report, covering the period October 1, 2016 through October 19, 2016, shall be filed no later than October 27, 2016. 52 U.S.C. § 30104(a). Because records at the Federal Election Commission ("FEC") indicate that you did not file this report prior to four (4) days before the General Election held on November 8, 2016, the report is considered not filed for the purpose of calculating the civil money penalty. You should file the report if you have not already done so.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On March 22, 2017, the FEC found that there is reason to believe ("RTB") that SEAL PAC Supporting Electing American Leaders PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before October 27, 2016. Based on the FEC's schedules of civil money penalties at 11 C.F.R. § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$12,503. Please see the attached copy of the Commission's administrative fine regulations at 11 C.F.R. §§ 111.30-111.46. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 C.F.R. § 111.34. Your payment of \$12,503 is due within forty (40) days of the finding, or by May 1, 2017, and is based on these factors:

Election Sensitivity of Report: Election Sensitive
Level of Activity: \$314,463
Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 8, 2016 are considered not filed for the purpose of calculating the penalty)
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the Commission's RTB finding, or May 1, 2017. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that SEAL PAC Supporting Electing American Leaders PAC and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Aimee Wechsler in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther
Chair

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ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$12,503 for the 2016 Pre-General Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
P.O. Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: SEAL PAC Supporting Electing American Leaders PAC

FEC ID#: C00570226

AF#: 3252

PAYMENT DUE DATE: May 1, 2017

PAYMENT AMOUNT DUE: \$12,503

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

2017 JUN 19 PM 1:04

June 19, 2017

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Debbie Chacona *DC*
Assistant Staff Director
Reports Analysis Division

BY: Kristin D. Roser/Ben Holly *KE BH*
Reports Analysis Division
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the
2016 12 Day Pre-General Report (Unauthorized Committees – Quarterly
Filers)

Attached are two lists of political committees and their treasurers against which the Commission has found reason to believe (RTB) and assessed proposed civil money penalties calculated at RTB for failure to file or failure to timely file the 2016 12 Day Pre-General Report. The first list represents the committees that have paid the civil money penalty and the second list represents the committees that have not paid the civil money penalty. The committees that have not paid have been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.34 and 11 CFR § 111.40, the Commission shall send a final determination notice to those respondents that have either paid or not paid the civil money penalty.

For your information, two (2) committees disclosed a change in treasurer after the RTB finding. An overview of these cases has been provided below.

CONFIDENTIAL

CONFIDENTIAL

CONFIDENTIAL

- CONFIDENTIAL**

Federal Election Commission
FD Circulation Report Fine Paid
2016 PRE-GENERAL Election Sensitive 10/27/2016 UNAUTH_Q

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Final Money Penalty	Date Paid	Amount Paid
3236	AMERICAN PRINCIPLES BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC)		C00492579	EYTAN LAOR	12/08/2016	Not Filed	\$2,796	0	03/22/2017	\$654	\$654	05/17/2017	\$654
3237	GNA FINANCIAL		C00559146	JERED TAYLOR	01/26/2017	Not Filed	\$21,190	0	03/22/2017	\$1,176	\$1,176	05/02/2017	\$1,176
3238	CORPORATION CITIZENS FOR GOOD GOVERNMENT COMMUNICATION		C00078287	KAREN E. MELCHERT	11/28/2016	Not Filed	\$28,698	0	03/22/2017	\$1,829	\$1,829	04/25/2017	\$1,829
3239	WORKERS OF AMERICA LOCAL 13000		C00109595	MARISA MACCRORY	12/08/2016	Not Filed	\$15,242	0	03/22/2017	\$1,176	\$1,176	04/19/2017	\$1,176
3240	CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION		C00388181	JOHN P. LACEY	01/31/2017	Not Filed	\$1,000	0	03/22/2017	\$654	\$654	04/05/2017	\$654
3241	GCI PAC		C00387894	CHRIS NIERMAN	12/20/2016	Not Filed	\$1,007	1	03/22/2017	\$654	\$654	06/01/2017	\$654
3242	GOVERNMENT IS NOT GOD		C00297531	NANCY MURRAY	12/16/2016	Not Filed	\$8,218	0	03/22/2017	\$784	\$784	04/06/2017	\$784
3243	INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC)		C00332031	JASON TODD	12/08/2016	Not Filed	\$5,202	0	03/22/2017	\$784	\$784	04/06/2017	\$784
3244	INVERSCO PLC PAC LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE		C00253369	DOUG KIDD	12/08/2016	Not Filed	\$5,000	0	03/22/2017	\$784	\$784	04/25/2017	\$784
3245	MIDDLE CLASS AMERICA PAC		C00144170	HANS STERNBERG	12/06/2016	Not Filed	\$4,000	0	03/22/2017	\$654	\$654	04/13/2017	\$654
3246	NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC		C00486960	JIM BROEKGING	11/25/2016	Not Filed	\$12,000	1	03/22/2017	\$1,176	\$1,176	05/18/2017	\$1,176
3247	ROCK CITY PAC		C00528026	MICHAEL J. CORREIA	02/18/2017	Not Filed	\$1,000	0	03/22/2017	\$654	\$654	04/04/2017	\$654
3250	RUSS VICTORY FUND		C00436410	KIMBERLY KAEGLI	11/28/2016	Not Filed	\$42,504	0	03/22/2017	\$1,829	\$1,829	05/02/2017	\$1,829
3251			C00586180	JOHN W. MILLER	01/03/2017	Not Filed	\$540,606	0	03/22/2017	\$15,282	\$15,282	04/28/2017	\$15,282

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Federal Election Commission
FD Circulation Report Fine Not Paid
2016 PRE-GENERAL Election Sensitive 10/27/2016 UNAUTH_Q

AF#	Committee Name	Candidate Name	Committee ID	Treasurer	Receipt Date	Days Late	LOA	PV	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
3235	AMERICA COMES FIRST PAC		C00623256	DAVID W. SCHAMENS	12/05/2016	Not Filed	\$10,711	0	03/22/2017	\$1,176	89	\$1,176
3248	PATRIOTS LEADING A MAJORITY		C00526046	LOUIS SCHIAZZA	12/07/2016	Not Filed	\$49,000	0	03/22/2017	\$1,829	89	\$1,829
3252	SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC		C00570226	BARBARA P. LAZARIS	12/08/2016	Not Filed	\$387,182	0	03/22/2017	\$12,503	89	\$12,503

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Administrative Fine Program – Final)
 Determination Recommendation for the)
 2016 12 Day Pre-General Report)
 (Unauthorized Committees - Quarterly)
 Filers):)
 AMERICA COMES FIRST PAC, and) AF# 3235
 SCHAMENS, DAVID W MR. as treasurer;)
 AMERICAN PRINCIPLES, and LAOR,) AF# 3236
 EYTAN as treasurer;)
 BELIEVE IN LIFE LIBERTY YOURSELF) AF# 3237
 (BILLY PAC), and TAYLOR, JERED as)
 treasurer;)
 CNA FINANCIAL CORPORATION) AF# 3238
 CITIZENS FOR GOOD GOVERNMENT,)
 and MELCHERT, KAREN E. as treasurer;)
 COMMUNICATION WORKERS OF) AF# 3239
 AMERICA LOCAL 13000, and)
 MACCRORY, MARISA as treasurer;)
 CONNELL FOLEY PAC A NEW JERSEY) AF# 3240
 NON-PROFIT CORPORATION, and)
 JOHN P LACEY as treasurer;)
 GCI PAC, and NIERMAN, CHRIS as) AF# 3241
 treasurer;)
 GOVERNMENT IS NOT GOD, and) AF# 3242
 MURRAY, NANCY as treasurer;)
 INDEPENDENT ELECTRICAL) AF# 3243
 CONTRACTORS INC PAC (IEC PRIDE)
 PAC), and TODD, JASON as treasurer;)
 INVESCO PLC PAC, and KIDD, DOUG as) AF# 3244
 treasurer;)
 LOUISIANIANS FOR AMERICAN) AF# 3245
 SECURITY POLITICAL ACTION)
 COMMITTEE, and STERNBERG, HANS)
 as treasurer;)
 MIDDLE CLASS AMERICA PAC, and) AF# 3246
 BROEKING, JIM as treasurer;)
 NATIONAL CANNABIS INDUSTRY) AF# 3247
 ASSOCIATION PAC, and MICHAEL J.)
 CORREIA as treasurer;)
 PATRIOTS LEADING A MAJORITY, and) AF# 3248
 SCHIAZZA, LOUIS as treasurer;)

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ROCK CITY PAC, and KAEGL,) AF# 3250
KIMBERLY as treasurer;)
RUSS VICTORY FUND, and MILLER,) AF# 3251
JOHN W. as treasurer;)
SEAL PAC SUPPORTING ELECTING) AF# 3252
AMERICAN LEADERS PAC, and)
LAZARIS, BARBARA P. as treasurer;)

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election Commission, do hereby certify that on June 21, 2017 the Commission took the following actions on the Administrative Fine Program – Final Determination Recommendation for the 2016 12 Day Pre-General Report (Unauthorized Committees - Quarterly Filers) as recommended in the Reports Analysis Division's Memorandum dated June 19, 2017, on the following committees:

AF#3235 Decided by a vote of 5-0 to: (1) make a final determination that AMERICA COMES FIRST PAC, and SCHAMENS, DAVID W MR. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3236 Decided by a vote of 5-0 to: (1) make a final determination that AMERICAN PRINCIPLES, and LAOR, EYTAN in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3237 Decided by a vote of 5-0 to: (1) make a final determination that BELIEVE IN LIFE LIBERTY YOURSELF (BILLY PAC), and TAYLOR, JERED in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3238 Decided by a vote of 5-0 to: (1) make a final determination that CNA FINANCIAL CORPORATION CITIZENS FOR GOOD GOVERNMENT, and MELCHERT, KAREN E. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3239 Decided by a vote of 5-0 to: (1) make a final determination that COMMUNICATION WORKERS OF AMERICA LOCAL 13000, and MACCRORY, MARISA in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3240 Decided by a vote of 5-0 to: (1) make a final determination that CONNELL FOLEY PAC A NEW JERSEY NON-PROFIT CORPORATION, and JOHN P LACEY in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3241 Decided by a vote of 5-0 to: (1) make a final determination that GCI PAC, and NIERMAN, CHRIS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3242 Decided by a vote of 5-0 to: (1) make a final determination that GOVERNMENT IS NOT GOD, and MURRAY, NANCY in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3243 Decided by a vote of 5-0 to: (1) make a final determination that INDEPENDENT ELECTRICAL CONTRACTORS INC PAC (IEC PRIDE PAC), and TODD, JASON in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3244 Decided by a vote of 5-0 to: (1) make a final determination that INVESCO PLC PAC, and KIDD, DOUG in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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AF#3245 Decided by a vote of 5-0 to: (1) make a final determination that LOUISIANIANS FOR AMERICAN SECURITY POLITICAL ACTION COMMITTEE, and STERNBERG, HANS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3246 Decided by a vote of 5-0 to: (1) make a final determination that MIDDLE CLASS AMERICA PAC, and BROEKING, JIM in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3247 Decided by a vote of 5-0 to: (1) make a final determination that NATIONAL CANNABIS INDUSTRY ASSOCIATION PAC, and MICHAEL J. CORREIA in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3248 Decided by a vote of 5-0 to: (1) make a final determination that PATRIOTS LEADING A MAJORITY, and SCHIAZZA, LOUIS in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3250 Decided by a vote of 5-0 to: (1) make a final determination that ROCK CITY PAC, and KAEGI, KIMBERLY in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3251 Decided by a vote of 5-0 to: (1) make a final determination that RUSS VICTORY FUND, and MILLER, JOHN W. in his official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

AF#3252 Decided by a vote of 5-0 to: (1) make a final determination that SEAL PAC SUPPORTING ELECTING AMERICAN LEADERS PAC, and LAZARIS, BARBARA P. in her official capacity as treasurer, violated 52 U.S.C. 30104(a) and assess the final civil money penalty so indicated; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Federal Election Commission
Certification for Administrative Fines
June 21, 2017

Page 5

Attest:

June 22, 2017
Date

Dayna C. Brown
Dayna C. Brown
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 22, 2017

Barbara P. Lazaris, in official capacity as Treasurer
SEAL PAC Supporting Electing American Leaders PAC
50 Congress Street, Suite 318, C/O Barbara P. Lazaris
Boston, MA 02109

C00570226
AF#: 3252

Dear Ms. Lazaris:

On March 22, 2017, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that SEAL PAC Supporting Electing American Leaders PAC and you, in your official capacity as treasurer violated 52 U.S.C. § 30104(a) for filing late or failing to file the 2016 Pre-General Report. By letter dated March 24, 2017, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$12,503 in accordance with the schedule of penalties at 11 CFR § 111.43. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on June 22, 2017 that SEAL PAC Supporting Electing American Leaders PAC and you, in your official capacity as treasurer violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$12,503 in accordance with 11 CFR § 111.43. The civil money penalty is based on these factors:

Election Sensitivity of Report: Election Sensitive

Level of Activity: \$387,182

Number of Days Late: Not Filed (reports not filed prior to four (4) days before the General Election held on November 8, 2016 are considered not filed for the purposes of calculating the penalty)

Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be

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modified or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

3. If You Choose to Pay the Civil Money Penalty

If you should decide to pay the civil money penalty, follow the payment instructions on page 4 of this letter. You should make payment within thirty (30) days of receipt of this letter.

NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

4. Partial Payments

If you make a payment in an amount less than the civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assessed upon making a final determination.

5. Settlement Offers

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted

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payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 CFR §§ 111.42(b) and 111.20(c), the file will be placed on the public record within thirty (30) days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Aimee Wechsler at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,



Steven T. Walther
Chair

ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS

In accordance with the schedule of penalties at 11 CFR § 111.43, the civil money penalty is \$12,503 for the 2016 Pre-General Report. The payment is due within 30 days of receipt of this letter.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit www.fec.gov/af/pay.shtml to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission
PO Box 979058
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox
FEC #979058
1005 Convention Plaza
Attn: Government Lockbox, SL-MO-C2GL
St. Louis, MO 63101

PAYMENTS BY PERSONAL CHECK

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT

FOR: SEAL PAC Supporting Electing American Leaders PAC

FEC ID#: C00570226

AF#: 3252

PAYMENT AMOUNT DUE: \$12,503

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 3252

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